

UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Docket No.: 23-cv-3954 (NSR)

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SIDI MOUHAMED DEIDE, ADAMA SY, ABDALLAHI
SALEM, MOUHAMED SAID MALOUM DIN, and
JHONNY NEIRA, on behalf of himself and a class of others
similarly situated,

DECLARATION

Plaintiffs,

-against-

EDWIN J. DAY as Rockland County Executive; STEVEN M.
NEUHAUS as Orange County Executive,

Defendants.
-----X

I, Matthew G. Parisi, declare under the penalty of perjury that the following facts are true
and correct:

1. I am a member of the firm Bleakley Platt & Schmidt, LLP, co-counsel for
defendants Edwin J. Day as Rockland County Executive and Steven M. Neuhaus as Orange
County Executive in the above captioned matter.

2. I submit this declaration at the direction of this Court to address whether this
Court should abstain from adjudicating this controversy.

3. Attached as Ex. 1 is the May 16, 2023 Order to Show Cause issued in the matter
County of Orange v. Crossroad Hotel, et al. (Orange County Supreme Court Index Number
EF003107-2023).

4. Attached as Ex. 2 is the May 17, 2023 Order to Show Cause issued in the matter
County of Orange v. City of New York, et al. (Orange County Supreme Court Index Number
EF003109-2023).

5. Attached as Ex. 3 is the May 16, 2023 Order to Show Cause issued in the matter
Town of Newburgh v. Newburgh EOM LLC, et al. (Orange County Supreme Court Index
Number EF003105-2023).

6. Attached as Ex. 4 is the May 11, 2023 Order to Show Cause issued in the matter *County of Rockland et al. v. City of New York, et al.* (Rockland County Supreme Court Index Number 032065-2023).

7. Attached as Ex. 5 is the May 26, 2023 Order of Appellate Division in the matter *County of Rockland et al. v. City of New York, et al.* (Rockland County Supreme Court Index Number 032065-2023).

8. Attached as Ex. 6 is the May 9, 2023 Order to Show Cause issued in the matter *Town of Orangetown v. Armoni Inn & Suites, LLC, et al.* (Rockland County Supreme Court Index Number 032048-2023).

9. Attached as Ex. 7 is the May 28, 2023 Order to Show Cause issued in the matter *Town of Colonie v. The City of New York, et al.* (Albany County Supreme Court Index Number 904641-2023).

10. Attached as Ex. 8 is the May 19, 2023 Order to Show Cause issued in the matter *Town of Poughkeepsie v. South Road Hospitality LLC et al.* (Dutchess County Supreme Court Index Number 2023-51688) and the June 1, 2023 Order of the Hon. Philip M. Halpern in the removed action.

11. Attached as Ex. 9 is the May 23, 2023 Order to Show Cause issued in the matter *County of Onondaga v. City of New York et al.* (Onondaga County Supreme Court Index No. 5214/2023).

12. Attached as Ex. 10 is the May 23, 2023 Order to Show Cause issued in the matter *Town of Salina, New York v. CWP Syracuse I LLC* (Onondaga County Supreme Court Index No. 5226/2023).

13. Attached as Ex. 11 is the May 17, 2023 Owego County Press Release regarding its Emergency Order related to the Migrant Crisis.

14. Attached as Ex. 12 is the May 12, 2023 Emergency Order #2023-1 issued for Cortland County.

15. Attached as Ex. 13 is the May 11, 2023 Emergency Order 1 of 2023 issued for Oneida County.

16. Attached as Ex. 14 is the May 9, 2023 State of Emergency Proclamation and Local Emergency Order for Rensselaer County.

17. Attached as Ex. 15 is the May 18, 2023 State of Emergency Declaration for Chautauqua County.

18. Attached as Ex. 16 is the May 18, 2023 Local Emergency Order for Niagara County.

19. Attached as Ex. 17 is the June 1, 2023 Local State of Emergency No. 4 for Genesee County.

Dated: White Plains, New York
June 5, 2023

BLEAKLEY PLATT & SCHMIDT, LLP

By: /s/ Matthew G. Parisi
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